



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP
F. #2013R01203

271 Cadman Plaza East
Brooklyn, New York 11201

October 23, 2014

By ECF

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Re: United States v. Abraxas Discala, et al.
Criminal Docket No. 14-399 (ENV)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosures under cover of letters dated August 11, 2014, August 15, 2014, August 29, 2014 and October 15, 2014. The government again requests reciprocal discovery.

Based on a request received from counsel for defendant Kyleen Cane, the government has, as a courtesy, made available at First Choice Copy ("First Choice") for reproduction to the defendants as a "Concordance load file" the entire document and data production previously made available under cover of our letters dated August 29, 2014 (Bates stamped EDNY-ITEN-000001022 – EDNY-ITEN-000327324; print order number 80072) and October 15, 2014 (Bates stamped EDNY-ITEN-000327325 – EDNY-ITEN-000329235). The documents and data on the Concordance load file have been re-Bates stamped as DOJ-ITEN-000000001 – DOJ-ITEN-000339035.

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You may obtain these materials by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing print order number **80075**. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____ /s/
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Cc: Clerk of Court (ENV) (by ECF) (w/o enclosures)